



## Mars Khaimov Law, PLLC

### VIA ECF

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED *Vernon S. Broderick*  
VERNON S. BRODERICK  
U.S.D.J.

In light of ongoing settlement discussions, the deadline for Plaintiff to file an application for default judgment is hereby extended to May 21, 2024.

Dated: March 19, 2024

Re: Case 1:24-cv-00424-VSB, Tarr v. Dora Maar USA, Inc.  
Plaintiff's Request for Extension of Time to Seek a Default Judgement

Dear Judge Broderick:

Plaintiff respectfully submits this letter to request for an extension of time of sixty (60) days of the deadline to seek a default judgement, which is due on March 22, 2024 in accordance with the directives set forth in the March 17, 2024 order. Our office is currently in communication with an attorney for the Defendant. The Parties are now discussing the possibility of resolving the lawsuit. If the Parties are unable to settle this matter, Defendant's counsel intends on requesting an extension of time to respond to the Complaint. As such, Plaintiff request for an extension of the deadline to seek a default judgement up to and until May 21, 2024. This is first time this relief is being requested.

We thank Your Honor for the attention and consideration herein.

Respectfully submitted,

*/s/ Mars Khaimov*  
Mars Khaimov, Esq.  
Attorneys for Plaintiff

Cc: all Counsel of record on ECF

